



IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

NATALIE SOTO,

Plaintiff,

v.

WENDELL HOLMES, JR.,

Defendant.

Civil Action No. 1:24-cv-02911-SDG

Defendant's Motion & Statement to the Court

I. Reassertion of Motion to Dismiss for Lack of Jurisdiction

Your Honor,

I respectfully request the Court to address my previously filed Motion to Dismiss for Lack of Jurisdiction, submitted approximately two weeks ago. I have not received any response to this motion. Jurisdiction is a fundamental issue that must be resolved before proceeding further.

II. Request for Forensic Analysis of Recording

During my deposition, the plaintiff's attorney presented a recording they allege contains my voice admitting to sharing the plaintiff's nude photo. I cannot confirm the authenticity of this recording and have concerns that it may have been altered or manipulated.

I am requesting the Court to order a forensic analysis of this recording to verify its authenticity and determine if any alterations have been made. The credibility of this evidence is crucial to this case.

III. Plaintiff's Misconduct in Sharing Another Woman's Nude Photos

During the deposition, the plaintiff's attorney presented documents that contained two nude photos of another woman. The apparent chain of distribution is as follows:

• Dawn Douglas → Plaintiff (Natalie Soto) → Plaintiff's Attorney (Joseph Weeks) → Court Clerk → Myself (Defendant).

This chain of distribution demonstrates that the plaintiff, through her attorney, engaged in the unauthorized sharing of another woman's nude photos, which is a violation of that woman's privacy and a potentially criminal act. The plaintiff's conduct in distributing these photos directly contradicts her allegations against me and raises questions about her credibility and motives.

IV. Clarification of Deposition Testimony

During my deposition, I was under extreme stress and felt pressured by the circumstances. My responses were not entirely accurate, particularly regarding whether I shared the plaintiff's nude photo with Dawn Douglas.

I acknowledge that I made an incorrect statement during the deposition. My intention has always been to provide accurate information. The stress of the situation caused me to respond improperly, and I am now seeking to correct the record.

I respectfully request the Court's permission to clarify my deposition testimony to provide a truthful and accurate account of events.

V. Conclusion

I am respectfully requesting the Court to:

1. Address and respond to my motion to dismiss based on lack of jurisdiction.
2. Order a forensic analysis of the recording to determine its authenticity.
3. Consider the plaintiff's misconduct in distributing another woman's nude photos.
4. Allow me to clarify my deposition testimony as necessary.

Respectfully submitted,



Wendell Holmes Jr. (Pro Se Defendant)